REMARKS

Claims 1-37 are pending, with claims 1, 15, and 25 being independent.

Claims 1-9, 13-19, 23-29, and 34-37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cox (6,738,814) in view of Watson (5,475,839). Applicants respectfully traverse this rejection.

Claims 1, 15, and 25 recited a method (claim 1) and a system (claims 15 and 25) for securing an accessible computer system that include, among other features, monitoring a computer system for connection transactions between multiple access requestors and multiple access providers using a switching component connected to the multiple access providers. An access requestor is denied access to the access providers when a number of connection transactions exceeds a configurable threshold number.

Applicants respectfully request reconsideration and withdrawal of this rejection because Cox and Watson, either alone or in combination, fail to describe or suggest denying access to an access requestor when *a number of connection transactions* exceeds a configurable threshold number in the manner recited in independent claims 1, 15, and 25.

Cox describes blocking denial of services attack on a routing device by analyzing incoming data packets from a public network and matching the packets against known attack patterns. See Cox, col. 1, lines 61-67. As acknowledged in the Office Action, Cox does not describe or suggest denying access to an access requestor when a number of connection transactions exceeds a configurable threshold number. See Office Action mailed June 18, 2004 at pp. 2-3. The Office Action therefore relies on Watson to describe denying access to an access requestor when a number of connection transactions exceeds a configurable threshold number. However, Watson does not include this feature.

Watson describes a system that prevents access to a computer network by denying a user access to a single personal computer that is leveraged by the user in attempting to gain network access. Specifically, once a threshold number of invalid login attempts are made using a single personal computer, Watson describes a mechanism for locking the personal computer and requiring the personal computer to be rebooted before another login attempt may be performed.

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See Watson, abstract and col. 13, line 6 to col. 14, line 44. Thus, Watson generally relates to monitoring the number of *attempts* made by an unauthorized requestor to establish a *single connection* with a personal computer. "By requiring the system to be rebooted after a predetermined number of failed login attempts, considerable difficulty is encountered by the unauthorized user who is attempting to illegally gain access to the system." See Watson, col. 14, lines 34-37.

Claims 1, 15, and 25 relate to denying access to a requestor based on the number of connection transactions by the requester through a switching component to an access provider. By contrast, as described above, the access denial in Watson comes not as a result of the number of connection transactions, but as a result of an entirely different concept – the concept of denying access based on the number of connection attempts used to establish the single login to a personal computer. Watson nowhere describes the use of the number of connection transactions by a requestor to deny access to multiple access providers through a switching component. As such, any proper combination of Cox and Watson would also fail to do so.

For at least the reasons presented above, Applicants respectfully request withdrawal of the rejection of claims 1, 15, and 25, and their dependent claims 2-9, 13, 14 16-19, 23, 24, 26-29, and 34-37.

Claims 10-12, 20-22, and 30-33 which depend from their respective independent claims 1, 15, and 25, apparently stand rejected under 35 U.S.C. §103(a) as unpatentable over Cox in view of Watson and in further view that the recited features are allegedly well known to one skilled in the art, although it is not explicitly so stated in the Office Action. Applicants respectfully traverse this rejection on the grounds that the Office Action fails to establish a prima facie case of obviousness because the claim features as recited were not well-known in the art.

Specifically, the Office Action merely suggests that these claims diverge from claims 1-4 only through their recitation of a second configurable time period, and then simply posits that "the uses and advantages of a second configurable time period are well [known] to one skill[ed] in the art." Applicants disagree with both of these positions. First, these claims recite additional limitations that do not appear to be considered or appreciated by the Office Action, namely, e.g.,

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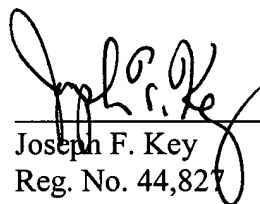Filed   : September 20, 2000
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(1) denying access to the access providers through the switching component by the attacking requestor for a second configurable period of time (claim 10); (2) resetting the second configurable period of time after detecting a new connection transaction initiated by the attacking access requestor through the switching component during the second configurable period of time (claim 11); and (3) denying access to the access providers through the switching component by the attacking access requestor for a second configurable period of time after detecting a most recent connection transaction initiated by the attacking access requestor through the switching component (claim 12). Second, uses and advantages of a second configurable time period were not well known, particularly in the context of the invention claimed. Applicants request that any future action that maintains this rejection provide explicit documentary evidence to establish that these features were well-known in the art.

For at least this reason and based on their dependency to independent claims 1, 15, and 25, Applicants respectfully request withdrawal of the rejection of claims 10-12, 20-22, and 30-33. Applicants submit that all claims are in condition for allowance.

No fees are believed to be due. However, during prosecution of this application, please apply any deficiencies or credits to deposit account 06-1050.

Respectfully submitted,

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